

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

CHAD MICHAEL LEHOFFER,

Defendant.

**UNDER SEAL**

Case No. 1:22-mj-87

**AFFIDAVIT IN SUPPORT OF A**  
**CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Daniel Schneider, being duly sworn, depose and state:

1. I am a Special Agent with the U.S. Department of Homeland Security (“DHS”), Homeland Security Investigations (“HSI”), and have been by employed by HSI since 2017. I am currently assigned to the Office of HSI, Washington, D.C. (“HSI DC”), and have investigated crimes relating to child exploitation on the Internet since approximately July 2012.

2. I have advanced and on-the-job training in child exploitation on the Internet and have participated in federal, multi-jurisdictional, and international investigations, many of which involved child exploitation and/or child pornography offenses. As part of my current duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal distribution, receipt, transportation, possession, and access with intent to view child pornography, in violation of 18 U.S.C. §§ 2252(a) and 2252A(a). I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256).

3. This affidavit is submitted in support of a criminal complaint and arrest warrant charging Chad Michael Lehofer (“LEHOFER”), having a prior conviction under the laws of any state relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, with transportation of child pornography, in violation of Title 18, United States Code, Section 2252(a)(1) & (b)(1). For the reasons set forth below, I submit that probable cause exists to believe that, within the Eastern District of Virginia and elsewhere, between on or about February 20, 2020, and on or about June 17, 2020, LEHOFER transported child pornography.

4. I am familiar with the information contained in this affidavit based upon the investigation that I have conducted, along with my conversations with other law enforcement officers, computer forensic agents and others, and my review of reports and database records.

5. This affidavit is submitted for the limited purpose of obtaining a criminal complaint and arrest warrant. It does not include each and every fact known to me or the government about the investigation. I have set forth only those facts that I believe are necessary to establish probable cause.

#### **STATUTORY AUTHORITY AND DEFINITIONS**

6. Title 18, U.S. Code, Section 2252(a)(1), prohibits knowingly transporting using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, any visual depiction, the production of which involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct.

7. “Child pornography,” as used in this affidavit, is any visual depiction of sexually explicit conduct where the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct.

8. The term “minor,” as defined in 18 U.S.C. § 2256(1), means any person under the age of 18 years.

9. The term “sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2)(A)(i)–(v), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person.

10. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on a computer disc or other electronic means which is capable of conversion into a visual image, and data that is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

## **INVESTIGATION OF CHAD MICHAEL LEHOFER**

### ***Information Received from HSI San Francisco***

11. On or about August 12, 2019, the HSI DC received information from HSI San Francisco pertaining to the sexual exploitation of a child on a dark web<sup>1</sup> forum. The minor victim, a 15-year-old at the time the pictures were taken, (hereinafter, “MINOR VICTIM 1,” born in 2003) was identified through the information posted, which included several of MINOR VICTIM 1’s social media accounts. MINOR VICTIM 1 agreed to meet with law enforcement to be interviewed. During the interview MINOR VICTIM 1 stated that a person (later identified as LEHOFER, as detailed below) was blackmailing her to send nude photos and videos of herself. The victim also

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<sup>1</sup> The term “dark web” generally describes part of the World Wide Web that is only accessible by means of special software or browser configurations and that provides a level of anonymity to users and website operators.

stated LEHOFER sent her an image of an adult penis and expressed interest in meeting her in person. MINOR VICTIM 1 stated that she sent numerous images and videos to LEHOFER.

12. Between or about April 2, 2019, and April 9, 2019, MINOR VICTIM 1 took screenshots of a portion of a conversation with LEHOFER on the social media platform Snapchat. The screenshots depict LEHOFER<sup>2</sup> sending messages stating, “Put two fingers in your throat then put them in your pussy. Is it still sending? Spread your legs on your knees and rub your pussy[.] Make it work[.]” MINOR VICTIM 1 replied by sending a video depicting her masturbating while on her knees. LEHOFER sent additional messages where he threatened to send images of MINOR VICTIM 1 to her mother and to her social media followers. MINOR VICTIM 1 asked LEHOFER, “can u just fucking stop and leave me alone? please i did nothing to you[.]” LEHOFER replied, “After you fuck me I said I would[.]”

13. LEHOFER communicated with MINOR VICTIM 1 on Snapchat and by text message using a phone number ending in 2328. Between December 2018 and April 2019, MINOR VICTIM 1 sent LEHOFER approximately one hundred pictures and approximately fifty videos, including images depicting her genitals and videos of her masturbating.

#### ***Identification of LEHOFER***

14. Over the course of the investigation, HSI learned that the phone number ending in 2328 was assigned to TextNow, a Voice over Internet Protocol (VoIP) service. TextNow allows users to text and call any number in Canada and the United States. TextNow provides the user with a real phone number which can be used on any smartphone, tablet, or desktop computer with an

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<sup>2</sup> The screenname LEHOFER used is a variation of MINOR VICTIM 1’s true name and is likely an account LEHOFER created to impersonate MINOR VICTIM 1.

Internet connection. HSI served a DHS summons on TextNow for the 2328 phone number and received subscriber information showing that the phone number was registered with an email address of **chadmichaelpro@gmail.com** on February 2, 2019. TextNow also provided IP address information associated with the phone number. The account was accessed from IP address 72.219.255.205 (hereinafter “IP-205”) contemporaneously with the messages to MINOR VICTIM 1 in April 2019. Additionally, TextNow confirmed that IP-205 was used to access the phone number as recently as July 2019. An open-source search online reveals IP-205 belongs to Cox Communications.

15. Records provided by Snapchat in response to a DHS summons show that a user from IP-205 accessed LEHOFER’s Snapchat account on or about April 8, 2019.

16. On or about August 12, 2019, pursuant to a DHS summons, Cox Communications provided subscriber information for IP-205, which shows the account subscriber is LEHOFER’s mother at a residence in Fredericksburg, Virginia (hereinafter “Fredericksburg Residence”). Cox Communications stated the listed IP address has been assigned to this subscriber starting on July 13, 2018, and continuing to the date of the summons.

17. On or about March 2, 2020, HSI executed a search warrant on Google for information related to the email address **chadmichaelpro@gmail.com**. According to the information provided by Google, the registered user was Chad Michael with an associated Virginia telephone number. The Google account was accessed by multiple IP addresses, including IP-205 assigned to the Fredericksburg Residence. In emails within the **chadmichaelpro@gmail.com** email account, there were emails relating to Gauntlet Golf Club, a golf course in Fredericksburg, Virginia. A review of the Gauntlet Golf Club’s webpage “Meet the Staff” section indicates an

individual named “Chad Michael” is employed at the Club. The Virginia Employment Commission records show that an individual named “Chad LEHOFFER” is employed at the address of Gauntlet Golf Club.

18. On June 10th, 2020, your affiant conducted a search via an online property tax database maintained by Stafford County, Virginia. According to this database the Fredericksburg Residence is owned by LEHOFFER’s parents. A further search of that address in a law enforcement database revealed that an individual named “Chad Michael LEHOFFER” provided the Fredericksburg Residence as his residence on his Virginia driver’s license.

19. Your affiant conducted a criminal history check for Chad LEHOFFER and found an individual named Chad Michael LEHOFFER with matching date of birth and social security number was previously convicted in 2006 for multiple counts of sexual assault, including one count involving illegal sexual contact with a minor under 16. LEHOFFER pleaded guilty on July 12, 2006, to violating Conn. Gen. Stat. Ann. § 53-21(a)(2), which prohibits “contact with the intimate parts, as defined in section 53a-65, of a child under the age of sixteen years or subjects a child under sixteen years of age to contact with the intimate parts of such person, in a sexual and indecent manner likely to impair the health or morals of such child.”

***Search of LEHOFFER’s Residence***

20. On or about July 17, 2020, the Honorable Ivan D. Davis, United States Magistrate Judge for the Eastern District of Virginia, issued a warrant to search the Fredericksburg Residence in connection with this investigation. HSI agents and other law enforcement officers executed the warrant on or about July 24, 2020.

21. LEHOFER was present in the residence at the time of the search. Law enforcement officers who participated in the search learned that LEHOFER lived at the Fredericksburg Residence, along with other members of his family. During the search, LEHOFER declined to speak to law enforcement officers and left the residence.

22. Pursuant to the warrant, law enforcement seized several electronic devices from LEHOFER's residence, including but not limited to an iPhone belonging to LEHOFER. Based on my training and experience and trade inscriptions on the device, your affiant knows that parts of LEHOFER's iPhone were not manufactured in the state of Virginia or the United States and was therefore shipped or transported in and affecting interstate and foreign commerce.

***Forensic Examination of LEHOFER's Devices***

23. Pursuant to the search warrant, law enforcement investigators conducted a forensic examination of the iPhone seized from LEHOFER's residence and discovered the phone contained an encrypted photo vault application called "Keepsafe Calculator" (also referred to as "Keepsafe"). Keepsafe Calculator is a private photo vault application which appears as a normal calculator on the user's phone. The user must enter a PIN code to access the application and may only save files to the application by purposely doing so.

24. The Keepsafe application on LEHOFER's phone contained hundreds of sexually explicit images and videos as summarized below:

- a. Videos and images of a prepubescent minor girl displaying her genitals, masturbating, and inserting objects into her genitals. The child is clearly prepubescent with no discernible signs of sexual maturation. The images and videos clearly depict the child sucking on her fingers, removing her pants,

exposing her genitals, spreading her labia, and touching her genitals with her fingers.

- b. A video of an unknown prepubescent minor girl displaying her genitals. The child is clearly prepubescent with no discernible signs of sexual maturation. The child spreads her legs and lifts her unclothed pubic area such that her genitals are the focal point of the video.
- c. Nine images of a minor girl displaying her genitals. The child appears to be in the early stages of puberty, with the only sign of sexual maturation being minimal pubic hair development. The images focus on the child's genitals and display her in various sexually suggestive poses.
- d. Over 100 videos and images of MINOR VICTIM 1 displaying her genitals and masturbating, saved in an album titled with MINOR VICTIM 1's Snapchat username. This is the same name that MINOR VICTIM 1 appeared under in LEHOFER's iMessages;
- e. Videos of LEHOFER engaged in sex acts with various females who are either adults or of a difficult-to-determine age.

25. The Keepsafe application also contained a screenshot of the contact information for the workplace of MINOR VICTIM 1's mother and screenshots of MINOR VICTIM 1's Instagram friends list.

26. Forensic examination further revealed that LEHOFER's phone contained evidence that TextNow was installed and later uninstalled. The phone also contained a note file with MINOR VICTIM 1's social media username, screen recordings of split-screen video chats depicting



LEHOFER's face as he chats with various unidentified women, and personal and professional documents belonging to LEHOFER.

***LEHOFER's Keepsafe Cloud Storage Account***

27. In addition to the photo vault application for a user's phone, Keepsafe has a remote cloud storage function which enables users to back up files saved on their phone to a cloud-based storage account. According to information publicly available on their website, Keepsafe users must activate the cloud storage feature in the Keepsafe application to enable remote cloud storage. Basic Keepsafe subscribers receive space for up to 200 items in their cloud storage account. Premium users receive for up to 10,000 items in their cloud storage account. Keepsafe's cloud storage feature enables users to transport images through the Internet—a means and facility of interstate commerce—from their device to Keepsafe servers.

28. In November 2021, HSI applied for and received a warrant to search LEHOFER's Keepsafe cloud storage account. Subscriber information for the Keepsafe account shows that the account is registered to therealhoff@gmail.com and was accessed by a device named "Chad's iPhone."

29. Between on or about February 20, 2020, and on or about June 17, 2020, LEHOFER saved to his Keepsafe cloud storage account multiple images and videos depicting minors engaged in sexually explicit conduct, including a screen recording of a Snapchat video message depicting a prepubescent minor girl removing her shorts and underwear, approaching the camera, displaying her genitals, and spreading her labia. At least some of these images and videos are the same as the ones discussed above.

**CONCLUSION**

28. For the reasons stated, I respectfully submit that there is probable cause to believe that, between on or about February 20, 2020 and on or about June 17, 2020, LEHOFER, having a prior conviction under the laws of any state relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, transported child pornography in violation of 18 U.S.C. § 2252(a)(1) & (b)(1). Therefore, I respectfully request that a criminal complaint and arrest warrant be issued for LEHOFER.

Respectfully submitted,



Special Agent  
Daniel Schneider  
Homeland Security Investigations

Subscribed to and sworn to in accordance with  
Fed. R. Crim. P. 4.1 by telephone on April 8, 2022.



Digitally signed by Ivan Davis  
Date: 2022.04.08 11:40:32  
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The Honorable Ivan D. Davis  
United States Magistrate Judge